

Attachment 2 - DOE/RFO Response to Comments from the CDH Letter of May 8, 1992  
Regarding Solar Evaporation Ponds Work Plan

The following is a summary of the CDH comments and associated responses/revisions. The comments were grouped into General Comments and Specific Comments for both the Work Plan and the responsiveness summary. The comments reference sections and/or pages of these documents but are not numbered. The numbering system in the left-hand column of the responses are based upon ordered numbering of the comments.

COMMENTS TO THE WORK PLAN

General Comments

G1 Although upgradient groundwater monitoring wells are no longer proposed as Phase I activities, references to these wells are still contained in Section 4. See the following references:

- First paragraph, page 2,
- First paragraph, page 5,
- Fourth bullet, page 6,
- Second paragraph of Section 4.2.2, page 8, reference is to ground water samples.

Response: All references to upgradient monitoring wells have been removed from Section 4.0.

Specific Comments

S1 Section 5.3.1: The first bullet item of page 4 should include the words "surficial soil samples" following the word "long."

Response: The text was revised in response to this comment.

S2 Section 7.0: In the first paragraph, page 2, the development of a project-specific Health & Safety Plan, at a later date, is of concern. DOE must ensure that this plan is developed in a timely fashion to prevent any further delay in commencement of investigation activities.

Response: Comment noted; no Work Plan revision necessary.

S3 Section 7.3.1: The fourth paragraph, page 9, describes an alpha screening process not described in EMD.OP (SOP) FO.14. Either a DCN should be used to update FO.14 or an SOP addendum should be provided to fully describe the proposed approach. This discussion should include the time span of each measurement to ensure that data are reliable and representative of actual activity levels.

Response: EG&G currently is developing an SOP governing the use of high-purity germanium gamma ray detection equipment for performing surface radiation surveys. The referenced text has been revised to indicate that the OU 4 radiation survey will be performed in accordance with this SOP and with SOP FO.16, Field Radiological Measurements.

S4 Section 7.3.2: In the first paragraph, page 11, DOE states that "a detailed work plan will be developed as a work element within the OU 4 Phase I RFI/RI effort..." for vadose zone investigations. This is acceptable; however, the Division expects DOE to provide a delivery date for this technical memorandum. Coordination with related field activities is required to assure that the opportunity to conduct vadose zone monitoring is not missed.

Response: Comment noted; no Work Plan revision necessary.

S5 Section 7.3.4.3: The reference to Figure 7-4 is incorrect; the reference should be to figure 7-3.

Response Section 7.3.4.3 of the Final Work Plan dated January 31, 1992 correctly references Figure 7-3, not Figure 7-4.

S6 Table 7-5: The locations of the radiological surveys are shown on Figure 7-1, not Figure 7-2 nor Figure 7-3.

Response: Table 7.5 was revised in response to this comment.

COMMENTS TO THE "RESPONSES" DOCUMENT

General Comments

G1 DOE's responses to the following CDH comments have not resulted in modifications to the originally referenced text as suggested in each response:

CDH-S1: Reference to soil sampling results is still missing.

CDH-S3: Per the response, and the Historical Release Report (HRR), Pond 207B North's asphalt planking was removed and relined with asphaltic concrete; however, paragraph three, page 6, section 2 continues to state that this liner was not removed, but was repaired.

CDH-S8: Replacement of direct contact with dermal contact was not made.

Replacement pages should be prepared to address these specific oversights.

Response: CDH-S1: Reference to soil sampling results has been added to Section 1.2.

CDH-S3: The responses to CDH-S3 and CDH-G4 reflected a misunderstanding of the information contained in the HRR. The HRR indicates that the asphaltic planking liner for Pond 207B North was removed and replaced with asphaltic concrete in 1961, shortly after the pond had been placed in service. Section 2.2.3 of the Work Plan discussed Pond 207B North cleanout and liner upgrade activities in conjunction with removing the 207B ponds from service in 1977. The responses to comments CDH-S3 and CDH-G4 have been revised as a result of this discrepancy. The information contained in the Work Plan is accurate, and no revisions were made.

The HRR Solar Evaporation Ponds narrative is being updated for submittal of the Final HRR in June 1992. It is also possible that additional historical information on the ponds will be incorporated into future quarterly updates of the HRR. The HRR will be reviewed shortly before commencement of OU 4 Phase I RFI/RI field activities, and the field sampling plan will be modified if necessary (with CDH and EPA concurrence) in light of any newly obtained historical information on the ponds.

CDH-S8: Reference to "direct contact" in Section 2.6.5 has been replaced with "dermal contract."

Specific Comments

S1            CDH-S19: DOE has not responded to the portion of the question concerning scheduling impacts if the Solar Ponds are not cleaned in time to allow completion of all RFI/RI activities. Again, what is DOE's intent, or plan, if this should occur?

Response:    EG&G and DOE are still evaluating impacts to the OU 4 assessment if the ponds are not cleaned out on time. The scheduling, contracting, and impacts are fully evaluated. CDH and EPA will be advised.

S2            EPA-S3: The response refers to "attached records" that should be used to amend Appendix B. Where were these records attached? The Division has been unable to locate them among the materials submitted.

Response:    The response to comments EPA-S3 contained a typographical error which has been corrected. The materials in question were submitted as an addendum to Appendix B entitled "Additional Appendix B Boring Logs," dated January 31, 1992.